

Exhibit 19

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN RE MICROSOFT CORP.
ANTITRUST LITIGATION

This Document Relates to:
Novell, Inc. v. Microsoft Corporation

Civil Action
No. JFM-05-1087

DEPOSITION OF:
JOSEPH BELFIORE

January 13, 2009
9:07 a.m.

VIDEOTAPED DEPOSITION BEFORE JOSEPH
ALBANESE, JR., a Certified Shorthand Reporter,
Certification Number 533 at K&L Gates, 925 4th
Avenue, Suite 2900, Seattle, Washington, on
Tuesday, January 13, 2009, commencing at 9:07 in
the morning, pursuant to notice.

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13 A L S O P R E S E N T:

14 Vincent Falcetano, video specialist
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1 Could you ask it just slightly differently?

2 Q. How do you know what Microsoft
3 did to design Microsoft Office for its Windows 95?

4 A. Well, I know that Microsoft has a fairly
5 standardized way of doing software development in
6 general. I know that we use roles which are
7 software design engineer and program manager. I
8 know that the methods of program management and
9 design are -- they tend to be similar group to
10 group. When we do things like recruiting or
11 education, within Microsoft, we do it uniformly
12 for the whole company. So there's a lot of common
13 understanding about how design work is done.

14 Our internal tools are often the
15 same. The way we report bugs, the way we might
16 write a spec. Those sorts of best practices are
17 common across the company.

18 So that gives me a very
19 significant basis for knowing how the Office team
20 would have done the design work.

21 Q. And that gives you the basis for
22 understanding how and why the Office team
23 developed its own file open dialog?

24 A. No, I wouldn't say that those general
25 things do.

1 Q. Okay. Is there anything that
2 gave you any special insight into how Microsoft
3 Office developed and designed its own file open
4 dialog?

5 A. Well, I certainly talked to people on
6 the Office team, and I was aware of the trade-offs
7 that they faced in making the decision of whether
8 to use the one we provided or to use their own.

9 I also knew historically what
10 decisions they had made even before Windows 95
11 shift, and I also knew pretty well what their
12 business constraints were, and by that, I mean
13 things like they targeted cross platforms, and in
14 this time frame they sold, I'm not sure of the
15 exact numbers, but roughly as many or more units
16 on the Macintosh as they did on Windows.

17 And so that was a significant
18 consideration in the technology decisions they
19 would make.

20 Q. Who did you talk to on the
21 Microsoft Office team?

22 A. Over the years many people.

23 Q. Did you talk about namespace
24 extensions with them?

25 A. I don't know whether I did or not.

1 Q. Did you ever tell them not to use
2 namespace extensions?

3 A. No.

4 Q. Were you aware whether or not
5 they were using namespace extensions?

6 MR. HOLLEY: Objection, asked and
7 answered.

8 A. I said I did not believe they were,
9 although there may have been some project
10 somewhere that I might have known about and don't
11 remember. Nothing of significance.

12 Q. Did you or anybody on your team
13 discourage them from using namespace shell
14 extensions?

15 A. No.

16 Q. You knew as of November '93 that
17 WordPerfect was planning to use those extensions,
18 didn't you?

19 MR. HOLLEY: Objection.

20 A. I don't think I knew that.

21 Q. Really? Did you get that
22 e-mail -- where is the November '93 e-mail? Do
23 you remember which number that one is?

24 MR. HOLLEY: One that says
25 they're happy they're going to be

1 documented?

2 MR. MARTIN: Sure.

3 MR. HOLLEY: I don't think that
4 says anything about what they're going
5 to do.

6 MR. MARTIN: We can ask him.

7 MR. HOLLEY: Okay. Your question
8 assumes facts not in evidence.

9 Q. Did you ask him about it, David
10 Cole?

11 A. Oh, yes.

12 Q. So you knew as of November '93
13 that WordPerfect was happy about Microsoft
14 deciding to document the shell extensions, right?

15 A. I knew that David Cole wrote in an
16 e-mail that David believed they were happy about
17 that.

18 Q. You had no reason not to believe
19 Mr. Cole, did you?

20 A. No.

21 Q. Okay. And you believed that ISVs
22 would in fact use those extensions to create
23 powerful browsing tools, is that right?

24 A. Yes.

25 Q. Do you have a view whether or not

1 WordPerfect's file open dialog was better or worse
2 than Microsoft's file open dialog?

3 A. I don't.

4 Q. Do you have an understanding
5 whether or not anyone at Microsoft ever told the
6 WordPerfect developers that those namespace
7 extensions might go away and they shouldn't rely
8 on them?

9 A. I don't.

10 MR. MARTIN: I have nothing
11 further.

12 MR. HOLLEY: I have no further
13 questions.

14 THE VIDEOGRAPHER: This is the
15 end of the deposition. The time is
16 2:29 p.m.

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